

TONYA MANGELS,
Plaintiff,
v.
AMERICAN MULTI-CINEMA, INC.,
Defendant.

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) **Case No. 4:19-cv-00834-BP**
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COMES NOW Plaintiff, by and through her undersigned counsel of record, and hereby moves the Court—unopposed—for leave to file a redacted copy of her Suggestions in Opposition to Defendant’s Motion for Summary Judgment, and a redacted copy of the supporting exhibits, that have now been submitted to the Court (via email) consistent with this Court’s July 16, 2021 Order and the previous confidentiality designations from the parties pursuant to this Court’s Protective Order.

1. On August 23, 2021, Plaintiff filed her Suggestions in Opposition to Defendant's Motion for Summary Judgment and all related exhibits under seal. [Doc. 105].

2. In its August 23 sealing Order, the Court directed Plaintiff to “file a renewed motion to seal or redact those documents and submit any proposed redactions to the Court” within two weeks of Plaintiff August 23 filing. [Doc. 104].

3. This is that motion, and contemporaneous with the filing of this motion, Plaintiff is sending the Court (via email) a copy of her proposed redactions consistent with this Court's July 16, 2021 Order and the previous confidentiality designations from the parties.

4. The redactions concern a personal relationship referenced in the Court's July 16, 2021 Order, and three additional exhibits containing personal bonus and compensation data applicable to multiple AMC employees.

5. Plaintiff and Defendant have now conferred on the subject of Plaintiff's proposed redactions, and Defendant does not oppose redacting the materials Plaintiff is submitting to the Court today via email.

6. The Plaintiff's interest in sealing the items referenced above outweighs any public interest as the confidential information at stake could cause personal and professional harm if disseminated to the public.

7. This motion is in no way made for purposes of vexation or delay, and is instead made in good faith for the purpose of allowing Plaintiff file a properly redacted copy of her brief and supporting exhibits.

WHEREFORE, for the aforementioned reasons, Plaintiff prays for an order of this Court granting leave to file a redacted copy of her Suggestions in Opposition to Defendant's Motion for Summary Judgment, and a redacted copy of her supporting exhibits, in the manner recently submitted to the Court (via email), and for such other and further relief as the Court deems just and equitable under the circumstances.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2021, a copy of the above and foregoing document was served by:

- ☒ Filing it with the Court's CM/ECF system;
- ☐ U.S. Mail, postage-prepaid;
- ☐ Facsimile;
- ☐ Email;
- ☐ Federal Express; and/or,
- ☐ Hand delivery, upon:

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